

Frederick County, Maryland, copies of said deeds are attached hereto marked Exhibit H, I, and J and incorporated herein by reference.

11. That the land that is the subject of this proceeding was subdivided in 1890 by the Mutual Land and Improvement Company of Baltimore City, as is shown by a plat recorded with a deed to such Company, dated September 1, 1890, and located such in Liber WIP 11, folio 473, one of the Land Records of Frederick County, Maryland. A copy of such deed is attached hereto, marked Exhibit K and incorporated herein by reference.

12. That the aforementioned Plat designates and sets out and creates a 15 foot wide alley way which was intended to be conveyed and dedicated to the Town of Brunswick, to serve as public access to the lots so developed.

13. That Complainant has abstracted title to the subject real property, but has been unable to locate any record of any conveyance of the foregoing alleyway, from the Mutual Land Improvement Company of Baltimore City to any person or organization.

14. That Complainant has made diligent efforts to ascertain the whereabouts of the officers, directors or resident agent and the business address of Mutual Land Improvement Company of Baltimore City, but has been unsuccessful therein. The State Department of Assessments and Taxation has no record of the incorporation in the State of Maryland of the Mutual Land Improvement Company of Baltimore, as is shown by the Certificate of the State Department of Assessments and Taxation dated June 5, 1981, (which certificate was obtained in similar litigation in Equity No. 32,171, in the Circuit Court for Frederick County, Maryland.) A copy of such Exhibit is attached hereto and marked Exhibit L.

15. That the records of incorporation, and the Charter of the Mutual Land and Improvement Company of Baltimore City, are located in Liber JB 28, folio 144 and 145, Charter Records of Baltimore City. A copy of such Charter is attached hereto marked Exhibit M and incorporated herein by reference.

16. That examination of such charter indicates that such Company was